

# EXHIBIT B

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Attorneys for Defendant  
NATIONAL CITY BANK

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

**SONIA RENAZCO,**

**Plaintiff,**

**v.**

**NATIONAL CITY BANK, and DOES 1  
through 100,**

**Defendant.**

Case No. \_\_\_\_\_

**DECLARATION OF THOMAS  
PLANT IN SUPPORT OF  
DEFENDANT NATIONAL CITY  
BANK'S NOTICE OF REMOVAL OF  
ACTION FROM STATE COURT**

**[28 U.S.C. §§ 1331, 1332, 1441 AND  
1446]**

I, THOMAS PLANT, declare and state as follows:

1. I am employed by National City Bank ("National City" or the "Company") in the Law Department as Assistant General Counsel and Secretary of the Board of Directors. The following is based on my review of Company records maintained in the ordinary course of business and, if called upon to do so, I could and would testify competently thereto.

2. National City Bank is a national banking association chartered under the laws of the United States with its principal offices located in Cleveland, Ohio

1 This declaration is made in accordance with 28 U.S.C. § 1746 and I declare under penalty  
2 of perjury under the laws of the United States that the foregoing is true and correct, and that this  
3 declaration was executed in Cleveland, Ohio on November 20, 2007.

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6 **THOMAS PLANT**

7 SFI-574024v1